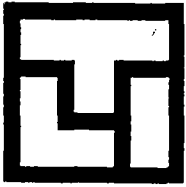
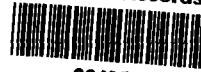


C. 2
5/4/98



EPA Region 5 Records Ctr.



264351

20 NORTH WACKER DRIVE, SUITE 1260, CHICAGO, IL 60606

TECHLAW INC.

PHONE: (312) 578-8900

FAX: (312) 578-8904

RZ2.R05052.01.ID.161

May 4, 1998

Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052; Environmental Priorities Initiative (EPI) Assessments; Guaranteed Tolerance Grinding, Rockford, Illinois, EPA ID No. ILD984908103; PA/VSI Report and NCAPS Scoring Report; Task 04 Deliverable

Dear Mr. Phillips:

Please find enclosed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report and the NCAPS Scoring Report for the referenced facility. The NCAPS total migration score is 19.92 with a high groundwater score (32.68) and surface water score (20.73). These scores are reflective of site conditions, including poor waste management practices of F001 waste.

Should you have any questions or require additional information, please feel free to contact me at (312) 345-8963 or Mr. Bill Wesley at (312) 345-8955.

Sincerely,

Patricia Brown-Derocher
Regional Manager

Enclosure

cc: F. Norling, EPA Region 5, w/o attachment
W. Jordan/Central Files
W. Wesley
Chicago Central Files



**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT
FOR
GUARANTEED TOLERANCE GRINDING
2136 12th AVENUE
ROCKFORD, ILLINOIS
EPA ID NO. ILD984908103**

Submitted to:

**Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604**

Submitted by:

**TechLaw, Inc.
20 North Wacker Drive, Suite 1260
Chicago, Illinois 60606**

EPA Work Assignment No.	R05052
Contract No.	68-W4-0006
TechLaw WAM	Mr. Rob Young
Telephone No.	312/345-8966
EPA WAM	Mr. Gerald Phillips
Telephone No.	312/886-0977

May 4, 1998

**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT
FOR
GUARANTEED TOLERANCE GRINDING
ROCKFORD, ILLINOIS
EPA ID NO. ILD984908103**

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I. EXECUTIVE SUMMARY

The first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) is the RCRA Facility Assessment (RFA). The purpose of the RFA is to identify environmental releases or potential releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that may require corrective action by the facility owner. A Preliminary Assessment/Visual Site Inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at the Guaranteed Tolerance Grinding (GTG) facility.

A Preliminary Assessment (PA) of the available Illinois Environmental Protection Agency (IEPA) file materials was conducted by TechLaw to gain familiarity with past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes, and waste management practices at the GTG facility.

A Visual Site Inspection (VSI) was conducted on November 4, 1997, by a TechLaw, Inc. (TechLaw) Team to identify and characterize the SWMUs and AOCs. Photographs were taken during the VSI and are documented in Appendix A, VSI field notes are included in Appendix B, and a site map showing SWMU locations is presented in Appendix C.

A total of three SWMUs and one AOC were identified and are described in Sections III and IV of this report. The Former Drum Storage Area(s) (SWMU 1) is characterized with a high release potential due to cracks in and discoloration of the concrete flooring of the unit. Records indicate that IEPA recommended soil sampling at this unit in 1996, however, no sampling was ever performed. The hazardous waste which were formerly stored in this unit were removed in April 1996, and no hazardous materials were stored in the unit at the time of the VSI.

The Fuel Oil USTs (AOC A) is characterized with a moderate release potential due to the lack of file material confirming the removal of the tanks. It is possible that four fuel oil USTs remain on the facility property and have not been maintained since the acquisition of the facility by GTG in 1990.

Mr. Myers informed TechLaw during the VSI, and during a later telephone conversation, that he had dissolved GTG on May 27, 1997 and re-opened the facility four months later under the name of Guaranteed Grinding (the current name recorded for the company in RCRIS). RCRIS indicates that the Guaranteed Grinding is no longer a generator of hazardous waste but that it is still in business. Guaranteed Grinding continues to be listed as a storage facility in RCRIS.

II. SITE DESCRIPTION

The current Guaranteed Tolerance Grinding (GTG) facility is located at 2136 12th Street in Rockford, Illinois. The facility is located in the NE1/4 of the SW1/4 of Section 36, T44N, R01E.

The facility consists of a two acre area which is secured within an industrial park area. File material indicates that the facility consists of a 3,400 square foot manufacturing building and a 1,000 square foot storage building. During the VSI, the manufacturing operations were found to have been housed in a 100-foot by 200-foot portion of one structure known as Building 1, a portion of which was used by the former Greenlee foundry operations (see below) according to GTG facility representatives.

From 1969 to 1973, the facility was owned and operated as a foundry by Greenlee Brothers & Company (Greenlee) and Ex-Cell-O Corporation. According to a February 1988 Generator Annual Hazardous Waste Report, both Greenlee and Ex-Cell-O operated under the EPA ID Number ILD005162912 at the facility site. Former Greenlee operations employed up to 1,200 workers at the facility. According to IEPA file material, the Greenlee foundry operations ceased in 1973, and the facility operated for the manufacture of hand and machine tools from 1973 to 1990 under the names of Greenlee Tool Company and Ex-Cell-O. Greenlee manufactured hand tools used primarily by plumbers and electricians, while Ex-Cell-O manufactured machine tools and rebuilt machines.

The former Greenlee foundry generated ignitable waste black oxide (D001), spent petroleum naptha (D001), corrosive liquids (D002), spent trichloroethylene (TCE) (F001), waste petroleum naptha (D001 and F003), waste lacquer (F003), and ignitable waste liquids (D001, F005). Documents addressing air emissions sources from the foundry and machine shop operations provide insight into potential sources of the hazardous waste listed above. For example, the Detrex Vapor Degreaser was the likely source of most of the F001 spent TCE, and D001 spent petroleum naptha was likely generated in a parts washer. Documented air emission sources at the former Greenlee facility included shot blast equipment, core ovens, heat treat equipment, paint spray equipment, bit miller, grinder/polisher, parts washer, vapor degreaser, caustic wash tank, lead pot heater, steel wheel, carburizer, non-hazardous scrap material incinerator, storage tanks, welding station, annealing furnace, forge shop, and chip making machines.

The following table (Table 1: Greenlee Waste Shipments - 1983 to 1989) provides an indication of the volumes of waste generated during those years.

TABLE 1: GREENLEE WASTE SHIPMENTS – 1983 to 1989

Date	Waste	Volume (gal)
1982	TCE (F001)	660
1983	TCE (F001)	325
1985	Spent TCE (F001)	440
1985	Waste Petro. Naptha (F003)	750
1984	Spent Mineral Spirits (F003)	2585
1984	Spent TCE (F001)	330
1984	Spent TCE (F001)	550
1985	Spent TCE (F001)	1074
1985	Spent Petro. Naptha (F003)	1556
1986	Spent TCE (F001)	640
1986	Spent Petro. Naptha (F003)	1433
1987	Spent TCE (F001)	847
1987	Spent Petro. Naptha (D001)	1787
1987	Spent TCE (F001)	377
1987	Spent Petro. Naptha (D001)	370
1987	Ignitable Liquid (F005)	715
1987	Ignitable Liquid (F001)	385
1987	Corrosive Solid (D002)	60
1988	Waste Liquid NOS Combustible UN1993 (D001)	1265
1988	Petroleum Naptha (D001)	150
1988	TCE ORMA (F001)	500
1988	Petroleum Naptha (D001)	935
1988	TCE (F001)	794
1989	Waste Black Oxide Ignitable NOS UN1993 (D001)	225
1989	Waste Lacquer Ignitable NOS UN1993 (F003)	110
1989	Corrosive Liquid NOS UN1769 (D002)	55
1989	Combustible Liquid NOS NA1993	55
1989	Waste Corrosive Solid NOS UN1759	165

Although the existence of waste accumulation/storage areas other than the Former Drum Storage Area (SWMU 1) currently in operation could not be confirmed during the PA/VSI, the number of wastes generated by Greenlee prior to 1990 suggest the possibility that other drummed waste storage areas were operated at the facility in the past. It should also be noted that although the use of SWMU 1 could only be confirmed from 1992, it is possible that Greenlee wastes mentioned in the above table were also stored at the current Drum Storage Area (SWMU 1) located in the northwest corner of Building 2.

The former Greenlee foundry operations included the use of two Number 2 fuel oil/natural gas boilers. These boilers consumed up to 4,000 gallons of oil per day. The foundry cupola charged 2000 pounds of metal, 320 pounds of coke, and 110 pounds of limestone every five minutes, yielding a melt rate of 11 to 12 tons per hour. Greenlee noted in its August 1978 Air Operating Permit Application that the facility had added six 20,000-gallon underground storage tanks (USTs) (Fuel Oil USTs - AOC A) to store Number 2 fuel oil.

GTG began operating a machine shop at the facility site in 1990. GTG facility representatives indicated to TechLaw during the VSI that GTG started operations in 1990. September 1992 file material indicated that GTG was a Small Quantity Generator under EPA ID Number ILD984908103.

GTG hazardous waste generating processes included parts washing, which generated Stoddard solvent (D001) and cutting oils (D001). In 1995, IEPA file materials indicate that a non-hazardous solvent was substituted for the Stoddard solvent and that a non-hazardous, cutting oil was substituted for the hazardous cutting oil.

Mr. Myers informed TechLaw during the VSI, and during a later telephone conversation, that he had dissolved GTG on May 27, 1997 and re-opened the facility four months later under the name of Guaranteed Grinding (the current name recorded for the company in RCRIS). RCRIS indicates that the Guaranteed Grinding is no longer a generator of hazardous waste but that it is still in business. Guaranteed Grinding continues to be listed as a storage facility in RCRIS.

At the time of the VSI, small portions of the facility were being leased to individuals. It appeared that tenants were using the facility for a variety of small scale operations including storage, welding, and woodworking.

Regulatory History

The majority of the available IEPA file material is related to former Greenlee air permitting issues. This documentation reveals that the facility was generally in compliance with air regulations/permit conditions. Limited information was found regarding RCRA permitting or compliance for the former Greenlee facility or the current GTG facility.

On November 17, 1969, Greenlee submitted a permit application to install and operate a Flibrico incinerator equipped with an integral spray chamber. The State of Illinois Air Pollution Control Board granted this permit on December 8, 1969, with the condition that only Type I waste such as dry paper or wood could be incinerated.

In June 1978, IEPA found Greenlee in non-compliance regarding the six Fuel Oil USTs (AOC A). The only specific information provided regarding the violations were a reference to citations

103(a) and 103(b). A description of these violations was not found in the available file materials. Later that summer, Ex-Cell-O Corporation, parent company for Greenlee, submitted an application to IEPA for an operating permit for the six, 20,000-gallon Fuel Oil USTs (AOC A).

Greenlee filed IEPA Generator Annual Hazardous Waste Reports on February 7, 1983; February 27, 1984; February 22, 1985; January 29, 1986; January 13, 1987; February 28, 1988, and February 28, 1990.

On August 2, 1983, Greenlee provided information to IEPA supplemental to a construction and operation permit application regarding vapor degreasing equipment specifications. This unit was a likely source of spent TCE (F001) generation at Greenlee.

IEPA conducted an Interim Status Standards Form B Generator Inspection at the Greenlee facility on November 10, 1983. Therefore, it appears likely that a Part A application was submitted prior to this date. Two violations were noted relating to personnel training records, and four violations relating to the contingency plan were cited. Ex-Cell-O (on behalf of Greenlee) responded that all violations had been corrected by December 16, 1983, however, no documentation was found to confirm Greenlee's return to compliance. In this inspection report, the IEPA inspector noted that "hazardous wastes are generated at various places throughout the facility. Once generated they are brought to a central location for packaging prior to storage (less than 90 days) and shipment off site." No location was provided for this storage area.

IEPA filed an Observation Report regarding the Greenlee facility on March 28, 1984. This report noted that Greenlee generated hazardous solvents, thinners and TCE. Remarks again indicated that hazardous waste was accumulated at various points in the facility prior to being moved to a central location in the plant for packaging and labeling, and finally to a building separate from the plant for storage. No further information identifying this storage area was provided.

In March 1984, Greenlee sampled its waste oil. Aqualab, Inc. analyzed the waste stream for 1,1,1-TCA, chlorobenzene, ethylbenzene and toluene. According to the sampling report, all concentrations tested were within "allowable limits", which were not provided.

In August 1985, an internal IEPA memorandum documented that Greenlee and Ex-Cell-O were two separate companies which generated the same waste streams: solvent, thinner, and TCE. Both companies were operating in compliance.

A RCRA Inspection Report, Form B-Generator Inspection was conducted at Greenlee on August 8, 1985 by IEPA. Eight drums of TCE were found in storage during the inspection. It was noted that Greenlee generated approximately 15 gallons of TCE a month, which it recycled through Gold Shield and Safety-Kleen. It also disposed of approximately 18 gallons/month of thinners, and 20 gallons/month of ignitable solvents. No description of regulated units was provided in

the inspection report. The only violations noted related to inadequacies in the contingency plan. Greenlee corrected the noted violations and on September 9, 1985, IEPA returned Greenlee to compliance.

An internal IEPA memorandum dated November 20, 1985 noted that Greenlee had not notified the department of its name change and recommended that the violation be noted in the next inspection.

In Greenlee's 1986 Generator Annual Hazardous Waste Report, it was reported that the facility was purchasing recycled TCE and using a still on the degreaser. In the report for the following year, it was noted that 12,000 gallons of coolant were recycled on-site.

September 23, 1992 is the first documented date that GTG notified U.S. EPA of its regulated waste activities. The only waste code provided was D001 (ignitability).

The available documentation does not contain records of any IEPA nor U.S. EPA inspections which may have been conducted for the GTG facility from its inception in 1990 until late 1995. On December 22, 1995, a RCRA compliance evaluation inspection was conducted following a complaint to IEPA of improper storage and illegal disposal of waste. This inspection resulted in the discovery of 14 un-marked drums in storage. The drums were believed to contain waste solvent and oil. They were stored in the northwest corner of Building 2 at the current Drum Storage Area (SWMU 1). The GTG facility manager was not aware of the generation of this material. He informed IEPA inspectors that Safety-Kleen had not been contracted with for waste disposal since 1992. He believed that the drummed material was a solvent used by Greenlee in parts washing operations. This inspection revealed 28 RCRA violations relating to hazardous waste storage for greater than 90 days without a permit, record keeping, the contingency plan, and the need to submit a closure plan. Laidlaw was subsequently contacted by GTG for removal and disposal of the waste.

As a result of their storage of hazardous waste for greater than 90 days, GTG submitted a closure plan for the "Former Drum Storage Area" (which is actually referred to as the current Drum Storage Area [SWMU 1] since it was managing waste during the VSI) on April 16, 1996. The plan documented that eighteen 55-gallon drums containing waste mineral spirits and cutting oil were scattered in a 50 foot by 60 foot area in the northwest corner of Building 1 on a concrete floor. Some discoloration and staining of the concrete was noted. The plan proposed that if IEPA deemed it necessary, samples would be collected from the stained concrete, and if underlying soils were determined to be contaminated, they would be removed. All drummed wastes were reportedly shipped off-site for disposal in February 1996.

Upon review of the closure plan, IEPA recommended that soil samples be collected underneath cracks or joints in the concrete floor and analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs) and total metals. If soil contamination was detected, GTG was to delineate the extent of the contamination. The Closure Plan was approved subject to

these conditions/modifications. However, no documentation was found in the available file material to indicate that soil samples had been collected. On March 11, 1998, the former GTG General Manager and Owner, Keith Myers, informed TechLaw that sampling had not been conducted. There are no records in the available file material to suggest that closure of the unit was ever approved by IEPA. Additionally, conversation with IEPA staff and review of RCRIS records (which still indicate storage status for the facility) suggest that closure was never completed or approved.

Environmental Setting

The GTG facility is bordered on the south and east by residential areas (separated by roads on each side), and on the north and west by other facilities within the industrial park in which GTG is located. According to a 1978 Plot Plan, the closest residences to the facility are 4,000 feet to the east, 4,000 feet to the south, 200 feet to the west, and 4,000 feet to the north. Seven schools are located within a one mile radius of the facility.

The GTG property is approximately 730 feet above sea level, and the general topography is flat according to U.S. Department of the Interior, Geologic Survey, Rockford North Quadrangle and Rockford South Quadrangle 7.5 Minute Series Topographic Maps, updated in 1993. No delineated wetlands are located within a five mile radius according to these topographic maps and a U.S. EPA SITEPLUS database map covering a two mile radius from the GTG facility. Mr. Dave Sanquist, City of Rockford, Illinois Water Division, was contacted to determine if the facility property was located in a floodplain. He indicated that according to FEMA National Flood Insurance Program Panel No. 171723-0020-B, the property is not located in a floodplain. U.S. EPA's SITEPLUS database map also indicated that two RCRA Treatment Storage and Disposal (TSD) or Large Quantity Generators (LQG) are located within a ½ mile radius; nine additional TSDs or LQGs are located within a one mile radius of the facility.

Based on the topography at the GTG facility, it appears that surface water run-off would flow in a west-southwesterly direction to the Rock River, approximately two miles from the facility. However, as the general area is highly developed, it is likely that surface water runs directly to a city storm water system.

According to Mr. Bob Nimmo and Mr. Sanquist, of the City of Rockford, Illinois Water Division, the Rock River lies two miles west of the GTG facility and is not used for drinking water but is designated for recreation and agriculture purposes.

According to the 1963 Rainfall Frequency Atlas of the United States, Technical Paper No. 40, and the 1968 Climatic Atlas of the United States, both produced by the U.S. Department of Commerce, the normal annual total precipitation for the Rockford area is 32 inches, the one year 24 hour rainfall value is two and a half inches, and the net precipitation is two inches.

According to the 1984 Illinois Department of Energy and Natural Resources: State Geological Survey Division publication, *Geology for Planning in Boone and Winnebago Counties*, Berg, R.C., Kempton, J.P. and Stecyk, A.N., Circular 531, this facility is underlain by unconsolidated glacial sediments which are, in turn, underlain by sandstone bedrock with some carbonates. The glacial sediments fill the Rock River valley up to a depth of 250 feet and consist of alternating layers of sand/gravel and lacustrine sand, silt and clay. Boring logs for a municipal supply well near the site indicate that the underlying sandstone bedrock extends as deep as 1,500 feet below grade, the boring completion depth.

Aquifer information obtained from Mr. Nimmo and Mr. Sanquist, of the City of Rockford, Illinois Water Division, confirmed the geological data provided above. According to Mr. Nimmo and Mr. Sanquist, there are two aquifers present beneath the GTG facility. The more shallow is an unconfined, unconsolidated sand and gravel aquifer which extends as deep as 250 feet in some areas. The deep aquifer is confined Mt. Simon sandstone which extends to approximately 1,500 feet. The groundwater table is 15 to 25 feet below grade.

To determine the location of groundwater wells in the vicinity of the facility, an information request was submitted to the Illinois State Water Survey (ISWS) which maintains databases for all registered private groundwater wells and all registered public, industrial, and commercial wells (PICS wells). In the State of Illinois, groundwater wells with less than 25 users or with yields of less than 75 gallons per minute are registered as private wells, while wells with greater than 25 users or with yields of greater than 75 gallons per minute are registered as PICS wells.

The ISWS information identified 12 PICS wells, drilled to depths between 150 and 1,060 feet, located within one mile of the facility and are registered as being in-use at the ISWS. One industrial-use PICS well is located within 200 feet of the facility and is drilled to a depth of 743 feet.

The ISWS information request identified no private wells within one-half mile of the facility. However, according to Mr. Nimmo and Mr. Sanquist, of the City of Rockford, Illinois Water Division, private wells were identified within one and one-half miles of the facility within an area of Rockford in which wells have been either sealed or had treatment systems installed.

Release History

On April 29, 1986, IEPA Department of Land Pollution Control (DLPC) filed a Complaint Investigation Form regarding Ex-Cell-O. An anonymous caller had reported that while Ex-Cell-O was digging out two USTs, one was tipped over into the hole. The caller also indicated that material which appeared to be oil was spilled in the process. IEPA investigated the site that day and determined that during the removal of two 2,000-gallon USTs and one 5,000-gallon UST, approximately 300 gallons of Admiral 100 Lubrication Oil were spilled. A Material Safety Data Sheet (MSDS) for this material indicates that constituents of the product were highly refined base oil and antioxidant (98%) and rust inhibitor defoamer (2%). The MSDS does not indicate that

hazardous constituents were in the Admiral 100 Lubrication Oil. Pumps and 55-gallon drums were used to remove 250 gallons of oil. Approximately 10 yards of oil-soaked sand was removed and transported to Pagel Pit Landfill for disposal. Ex-Cell-O informed IEPA that all reclaimed oil would be sold or recycled. The IEPA investigation report determined that no further action was necessary.

The day following the investigation, Ex-Cell-O submitted a written report of the incident to IEPA. According to this report, IEPA inspector Jack Holzer checked soil samples after removal of the oil-soaked sand. No other information was provided regarding this sampling activity. The report goes on to say that subsequent to Mr. Holzer's review of the sampling results, the remaining 5,000-gallon tank was removed and the hole was back-filled. Mr. Holzer's inspection report indicated "No further action needed". As the material apparently did not contain hazardous constituents and the release was expeditiously cleaned up in a manner sufficient to allow for a no further action determination from an IEPA on-scene inspector, the release location was not identified as an area of concern in this report.

No records reference the installation of 2,000-gallon nor 5,000-gallon USTs; the available files do contain documentation of the installation of six 20,000-gallon USTs installed in 1977. No other records provided any information regarding installation or removal of USTs at the facility.

III. SOLID WASTE MANAGEMENT UNITS

This section presents descriptions of the SWMUs identified during the PA/VSI for the GTG facility. Photograph numbers correspond to those presented in the Visual Site Inspection Photograph Log in Appendix A.

TABLE 2

**SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN
GUARANTEED TOLERANCE GRINDING, ROCKFORD, ILLINOIS**

SWMU/AOC	Description	Release Potential
SWMU 1	Drum Storage Area(s)	Moderate
SWMU 2	Parts Washer	Low
AOC A	Fuel Oil USTs	Moderate

SWMU 1 - Drum Storage Area(s)

Report Photograph No(s): 1, 2

Log Book Photograph No(s): 7A, 8A

Period of Operation: Available file materials confirm that the one documented waste storage area operated from at least 1992 to present. However, pre-1992 waste generation activities and narrative information in the available files suggest that the confirmed Drum Storage Area and/or other drum storage/accumulation areas were likely operated prior to 1992. Although RCRIS indicates that the facility no longer generates RCRA regulated hazardous waste, solid waste was observed during the VSI to be stored at this unit.

Location: The location of one area was confirmed to be in the northwest corner of Building 2. Additional areas may have existed elsewhere at the site, however this could not be confirmed from the available file materials.

Physical Description: According to the 1996 Closure Plan, the unit in the northwest corner of Building 2 is comprised of a 50 feet by 60 feet concrete pad with conventional joints. Some cracking and staining of the concrete was noted during the VSI. No engineered secondary containment such as berms or trenches were present, however, the unit is within a building.

Wastes Managed: According to an IEPA Narrative Inspection Report regarding a December 1995 compliance evaluation inspection of GTG, wastes formerly managed at the confirmed unit in the northwest corner of Building 2 were D001 waste Stoddard solvent (also known as mineral spirits, varsol, sovasol, naptha, and trimethylbenzene) and cutting oil (no waste code provided). These materials were generated by parts washing operations (SWMU 2). Eighteen 55-gallon drums of this material were observed by IEPA at this location during the December 1995 inspection. One bag containing non-hazardous swarf (only referenced as metal grindings – no other information provided) and floor sweepings was observed in this area during the VSI. This bag was stored on a wooden pallet.

As noted in the site description section (see Table 1), numerous other wastes have been managed at the facility in the past. The majority of these wastes would likely have been stored in drums somewhere on the site prior to being shipped off-site for treatment, recycling or disposal. Therefore, one of the Drum Storage Areas, but not necessarily the unit located in the northwest corner of Building 2, likely also managed waste generated prior to 1992 such as ignitable waste black oxide (D001), corrosive liquids (D002), spent trichloroethylene (TCE) (F001), waste lacquer (F003), and other ignitable waste liquids/solvents (D001, F005).

History of Releases: Staining and cracks in the concrete floor of the unit located in the northwest corner of Building 2, suggest that releases have occurred which may have migrated to underlying soils. IEPA approved a closure plan which required sampling activities to address

SWMU 1 - Drum Storage Area(s) (cont'd)

potential contamination to concrete and soils. Specifically, IEPA approved the closure plan with modifications which required that soil samples be collected from underneath cracks or joints in the concrete floor and analyzed for VOCs, SVOCs and total metals. Available files and conversations with facility representatives indicate that soil sampling was never conducted.

Potential for Past/Present Release:

High ()
Moderate (X)
Low ()

Conclusions: Sampling of concrete and underlying soils as specified in the approved closure plan for the unit in the northwest corner of Building 2 is recommended.

Additionally, as the existence of other potential drum storage/waste accumulation areas is likely but was not confirmed, it is recommended that U.S. EPA request that the facility clarify where wastes were stored prior to 1992.

SWMU 2 – Parts Washer

Report Photograph No(s): 3

Log Book Photograph No(s): 9A

Period of Operation: Parts washing operations have been conducted at the facility from at least 1973 to the present. The exact dates of operation for the parts washer currently operating is unknown.

Location: This unit is located in the northeast corner of Building 1.

Physical Description: This unit consists of an enclosed steel tank (approximately 4 feet by 5 feet by 1.5 feet deep) which utilized a solvent-based cleaning solution to remove cutting oils from tools. This unit is self-contained and the cleaning solution was recycled until the unit was serviced.

Wastes Managed: Prior to 1996, it is believed that Stoddard solvent (mineral spirits, D001) was the primary solvent used in parts washing operations. In 1996, the facility reported that parts washers were switched to a non-hazardous solvent and non-hazardous cutting oils were substituted for previous hazardous oil. File materials indicate that one parts washer at the facility generated approximately one drum of spent solvent every four months.

History of Releases: The available file materials contained no documentation of releases from parts washers. However, oily stains were observed during the VSI on the concrete floor surrounding the parts washer, providing evidence of potential past spills of solvent/oil around this unit. The concrete in the vicinity of this unit was observed to be intact.

Potential for Past/Present Release:

High ()
Moderate ()
Low (X)

Conclusions: Evidence of past spills of solvent/oil exists. However, due to the location of this unit within an enclosed warehouse on an intact concrete floor, it is not likely that these past spills caused any contamination.

IV. AREAS OF CONCERN

The following section provides a description of the AOC identified for the GTG facility.

AOC-A Fuel Oil USTs

Report Photograph No(s): None

Log Book Photograph No(s): None

Period of Operation: According to an August 5, 1978 Application for Air Operating Permit, these tanks were installed in 1977. There is no documentation which indicates they have been removed.

Location: Ten feet east of Building 1.

Physical Description: This unit consists of six 20,000-gallon Owens/Corning Fiberglass USTs. These tanks are 10'4" in diameter and 36'4" in length. They vent to the atmosphere.

Wastes Managed: The above-referenced 1978 permit application indicated that USTs were used for storage of Number 2 fuel oil.

History of Releases: None.

Potential for Past/Present Release:

High ()
Moderate (X)
Low ()

Conclusions: Limited information exists regarding the current presence of USTs at the GTG facility. Though GTG management indicated during the VSI that GTG never had a need for nor used USTs, records indicate that at least four 20,000-gallon USTs remain at the property from Greenlee/Ex-Cell-O operations. If current GTG management has no knowledge of these tanks, then there is the potential that the unit has not been maintained (including tank integrity testing) for a minimum of eight years. It is recommended that IEPA require GTG to investigate the condition and contents of all remaining USTs; if they are no longer in use, it is recommended that they be removed in compliance with Illinois UST regulations.

V. CONCLUSIONS

Further action is recommended for SWMU 1. Records indicate that IEPA required sampling activity which was never conducted. Regarding AOC A, it is suggested that U.S. EPA or IEPA request information from the facility to determine if the tanks are still in place. If the tanks are still at the facility, it is recommended that information be obtained regarding the integrity of the tanks.

There are many information gaps relating to waste management practices at the GTG facility. Given the past foundry operations conducted by Greenlee at the site, there is a significant potential for additional SWMUs and AOCs which were not identified in this PA/VSI. It is suggested that U.S. EPA submit information requests to current and past facility occupants to obtain more detailed information regarding past waste management practices, solid waste management units, and potential areas of concern. Information gained from those requests could be used to determine if a more comprehensive assessment is needed.

VI. REFERENCES

1. Letter from State of Illinois Air Pollution Control Board to J.M. Stewart, Greenlee Bros. & Co., dated December 8, 1969. Re: Permit granted to install incinerator.
2. Letter from Robert R. French, Chief, Bureau of Air Pollution Control, State of Illinois Environmental Protection Agency (IEPA), to Howard Johnson, Greenlee Bros & Company, dated April 7, 1971. Re: Permit granted to install an A.A.F. venturi scrubber on #9 Whiting cupola.
3. Miscellaneous foundry flow diagrams, dated 1972.
4. Notice of Federal Certification (State Certification Number 399-460-1) issued to Greenlee Bros. & Co. by R.J. Schneider, Director, Air & Water Programs Division, EPA, dated March 28, 1972. Re: Approval of above application.
5. Application for Certification of Pollution Control Facility submitted to EPA from Greenlee Bros. & Co., dated January 21, 1972. Re: Capping a No. 9 Whiting cupola.
6. Operating Permit Application from Greenlee Bros. & Co. to Division of Air Pollution Control, IEPA, dated November 20, 1972. Re: Permitting incinerator no. 399460. Existing emission sources identified.
7. Inter-office Correspondence from M.S. Hickey, Region 1, District 1, DAPC, IEPA to M.A. Zamco, Surveillance Section Manager, DAPC, IEPA, dated March 9, 1973. Re: Complaint investigation – Greenlee Bros.
8. IEPA Memorandum from M.S. Hickey to R.H. Goff, dated December 18, 1973. Re: November 8, 1973 investigation..
9. Letter from Michael D. Seyller, Greenlee Bros. & Co., to Thomas R. Casper, Attorney, Enforcement Services Section, Division of Air Pollution Control, IEPA, dated April 16, 1975. Re: permit application #03021063 for Machine Division. Attached is copy of permit issued on April 24, 1973, by IEPA, expiration date April 9, 1978.
10. Letter from Keith J. Conklin, P.E., Manager, Permit Section, Division of Air Pollution Control, IEPA, to Michael D. Seyller, Greenlee Brothers & Company, dated June 17, 1975. Re: Permit granted to operated cupola stack with conditions.
11. Letter from Keith J. Conklin, P.E., Manager, Permit Section, Division of Air Pollution Control, IEPA, to Michael D. Seyller, Greenlee Brothers & Company, dated June 20, 1977. Re: Permit renewal for cupola stack. Expired May 26, 1979.

12. **Air Pollution Episode Action Plan from Greenlee Bros. & Co., to IEPA, dated March 29, 1978. Re: Emergency contacts to be notified in event of episode.**
13. **Miscellaneous permit application process description pages, excerpted from unknown source, dated May 25, 1978.**
14. **Memorandum from G. Stonewall, Region 1, IEPA, to M.A. Zamco, IEPA, dated June 7, 1978. Re: Verification investigation. Violations 103(a) and 103(b) observed at fuel oil tanks.**
15. **Application for Operating Permit from Ex-Cell-O Corporation, owner, and Greenlee Bros. & Co., operator for Service Division, Greenlee, to Division of Air Pollution Control, IEPA, dated August 5, 1978. Re: Emission sources.**
16. **Position Description for Greenlee Bros & Co Plant Engineering Assistant in the Service Division, dated May 18, 1979.**
17. **Job Description for Greenlee Bros. & Co. M-197 Steel Warehousing, dated October 3, 1979.**
18. **Analytical Report from Aqualab Inc. to Ed Hogan, Greenlee Brothers, dated April 15, 1980. Sampled material: coolant from Machine Division Flume and Tank (semi-synthetic coolant).**
19. **Analytical Report from Aqualab Inc. to Ed Hogan, Greenlee Brothers, dated April 3, 1981. Sampled material: waste oil and solvent.**
20. **IEPA Generator Annual Hazardous Waste Report for Greenlee Bros., dated February 7, 1983. ID No. ILD005162912. Re: 1982 waste shipments.**
21. **IEPA, Division of Air Pollution Control Open Top Vapor Degreaser Questionnaire, dated August 2, 1983. Supplemental to Construction/Operation permit application and Compliance Plan and Project Completion Schedule.**
22. **Letter from Stephen A. Colantino, Manifest Sub-Unit, Compliance Monitoring Section, Division of Land Pollution Control, IEPA, to Ed Hogan, Greenlee Bros., dated August 25, 1983. Re: Forwarding copy of manifest.**
23. **IEPA Operating Permit issued to Greenlee Bros. & Co. to operate emission source(s) and /or air pollution control equipment consisting of grinders, polishers, heat treating operations, sand blasting, storage tanks, welding station, lead pot heating, annealing furnace, wash tank, wood sawing operation incinerator, degreaser, forge shop, and chip making machines. Permit effective September 7, 1983, expiration September 2, 1988.**

24. RCRA Inspection Report – Interim Status Standards Form B Generator Inspection, conducted at Greenlee Bros. Div. of Ex-Cell-O Manufacturing Systems, November 10, 1983.
25. Letter from Stephen A. Colantino, Manifest Sub-Unit, Compliance Monitoring Section, Division of Land Pollution Control, IEPA, to Ed Hogan, Greenlee Bros., dated December 6, 1983. Re: Forwarding copy of a manifest.
26. Letter from Robert A. Wengrow, Rockford Region Manager, Field Operations Section, Division of Land Pollution Control, IEPA, to Robert Boeke, Ex-Cell-O Mfg. Systems Co., dated December 6, 1983. Re: November 10, 1983 IEPA inspection and violations observed.
27. Letter from Robert L. Boeke, Plant Engineer, Ex-Cell-O Mfg. Systems Co., to Robert A. Wengrow, Rockford Region Manager, Field Operations Section, Division of Land Pollution Control, IEPA, dated December 16, 1983. Re: response to letter notice of violations. Noted corrective actions taken – all violations corrected. Attached position description for Plant Engineer.
28. *Ground-Water Regions of the United States, Water-Supply Paper 2242*, by Ralph C. Heath, U.S. Department of the Interior, Geological Survey, dated 1984.
29. IEPA Generator Annual Hazardous Waste Report for Greenlee Bros., dated February 27, 1984. ID No. ILD005162912. Re: 1983 waste shipments identified.
30. IEPA Observation Report for Greenlee Bros., dated March 28, 1984. Notes from report: generates hazardous solvents, thinners and TCE.
31. Analytical Report from Aqualab Inc. to Ed Hogan, Greenlee Brothers, dated March 30, 1984. Sampled material: waste oil. Analysis for 1,1,1-TCA, chlorobenzene, ethylbenzene and toluene.
32. IEPA Operating Permit-Revised, granted to Greenlee Bros. & Co., issued June 21, 1984. Expiration date September 2, 1988.
33. IEPA Memorandum from R. Jennings and R. Godare, Division of Air Pollution Control, Field Operations Section, to M. A. Zamco, dated December 17, 1984. Re: Inspection conducted December 6, 1984 at Ex-Cell-O Manufacturing.
34. IEPA Generator Annual Hazardous Waste Report for Ex-Cell-O Mfg. Systems (Greenlee Bros), dated February 22, 1985. ID No. ILD005162912. Re: 1984 waste shipments.

35. **Uniform Hazardous Waste Manifest No. IL1118241 for generator Ex-Cell-O Manufacturing Systems, dated May 1, 1985.**
36. **IEPA Memorandum from Jack Holzer to Division File, dated August 8, 1985. Re: Greenlee Tool Company and Ex-Cell-O Manufacturing Systems Company are two separate companies.**
37. **RCRA Inspection Report, Form B-Generator Inspection, conducted August 8, 1985 at Greenlee Bros. Div. Of Ex-Cell-O Manufacturing Systems Co. Remarks included: during inspection, 8 drums TCE in storage. Violations noted regarding contingency plan.**
38. **Letter from Mark A. Haney, Manager, Facilities Compliance Unit, Compliance Monitoring Section, Division of Land Pollution Control, IEPA, to Edwin C. Hogan, Greenlee Tool Co. Div. Of Ex-Cell-O Manufacturing Systems Co., dated August 22, 1985. Re: Violations from August 8, 1985 inspection.**
39. **Letter from Delbert E. Peterson, Chief of Police, City of Rockford, Illinois, to Edwin C. Hogan, Greenlee Tool Company, A Division Of Ex-Cell-O, dated August 23, 1985. Re: Receipt of contingency plan required by IEPA.**
40. **Letter from Sherry Leganger, Nurse Manager, Emergency Dept., Swedish American Hospital, to Edwin C. Hogan, Greenlee Tool Company, dated August 26, 1985. Re: Receipt of contingency plan required by IEPA.**
41. **Letter from Edwin C. Hogan, Greenlee Tool Company, A Division Of Ex-Cell-O, to Mark A. Haney, Division of Land Pollution Control, IEPA, dated August 27, 1985. Re: Notification of correction of violations from August 8, 1985 inspection.**
42. **Note from Jack Holzer, IEPA to file, dated September 9, 1985. Re: Response to violations.**
43. **Letter from Mark A. Haney, Manager, Facilities Compliance Unit, Compliance Monitoring Section, Division of Land Pollution Control, IEPA, to Edwin C. Hogan, Greenlee Tool Co. Div. Of Ex-Cell-O Manufacturing Systems Co., dated September 24, 1985. Re: Resolution of violations.**
44. **IEPA Memorandum from Hope Wright to Bob Wengrow, dated November 20, 1985. Re: Hazardous Waste Data Management System.**
45. **IEPA Generator Annual Hazardous Waste Report for Ex-Cell-O Mfg. Systems (Greenlee Bros), dated January 29, 1986. ID No. ILD005162912. A 25% reduction in solvent volume was noted due to separating waste oils. Re: 1985 waste shipments.**

46. Complaint Investigation Form filed by Dave Retzlaff, IEPA, Department of Land Pollution Control, dated April 29, 1986. Re: Anonymous call regarding Ex-Cell-O Mfg. Systems USTs removal.
47. Letter from Edwin C. Hogan, Plant Engineering Assistant, Greenlee, to Jack Holzer, IEPA, dated April 30, 1986. Re: Spill report, MSDS attached.
48. Letter from Edwin C. Hogan, Plant Engineering Assistant, Greenlee, to IEPA, Division of Land Pollution Control, dated February 27, 1987. Re: IEPA inspection of February 24, 1987.
49. IEPA Generator Annual Hazardous Waste Report for Greenlee Tool Co. Division of Ex-Cell-O Corp., dated January 13, 1987. ID No. ILD005162912. 1986 waste shipments identified.
50. IEPA Generator Annual Hazardous Waste Report for Greenlee Tool Co. -Textron, dated February 28, 1988. ID No. ILD005162912.
51. IEPA Memorandum from R. Godare to M.A. Zamco, dated March 17, 1988. Re: Inspection of Greenlee Tool Division (different address but same Plant Engineer addressed) on March 15, 1988.
52. Letter from Edwin C. Hogan, Plant Manager, Greenlee Tool TEXTRON, to Terry Sweitzer, P.E., IEPA, dated May 11, 1988. Re: Notice of discontinuing snag grinding, iron castings, web scrubber, and Peters-Dalton operations relating to permit no. 73021062. Note – address listed as 4455 Boeing Drive.
53. IEPA Generator Annual Hazardous Waste Report for Greenlee/Textron, dated February 28, 1989. ID No. ILD005162912. Location waste generated: 1222 Research Parkway, Rockford.
54. IEPA Operating Permit ID No. 201030ABX, permittee Excello Manufacturing Systems Co., issued April 10, 1989 expiration April 5, 1994. Granted to operate emission sources and/or air pollution control equipment consisting of a dual fired, natural gas and #2 oil, Gordon-Piatt Boiler and a natural gas fired only eclipse boiler .
55. IEPA Generator Annual Hazardous Waste Report for Greenlee/Textron, dated February 28, 1990. ID No. ILD005162912. Generator number for new location at 122 Research Parkway is ILD984774752. This report was for continued operations at 2136 12th Street.
56. EPA Notification of Regulated Waste Activity for Guaranteed Tolerance, dated September 23, 1992. ID No. ILD984908103, located at 2136 12th Avenue. Listed waste was D001 ignitable.

57. IEPA Bureau of Land/Field Operations Section, RCRA Inspection Report, Guaranteed Tolerance Grinding, dated December 22, 1995. ID No. ILD984908103
58. Narrative Report, prepared by IEPA dated January 24, 1996. Re: December 22, 1995 compliance evaluation inspection of Guaranteed Tolerance Grinding, ID 984908103. IEPA received complaint of improper storage of waste and illegal disposal of waste. Inspection revealed 14 drums of waste solvent and oil in storage. Inspection revealed 28 violations relating to HW storage, record keeping, contingency plan, closure plan:
59. IEPA Bureau of Land/Field Operations Section, RCRA Inspection Report, dated December 22, 1995.
60. Letter from Robert A. Wengrow, Manager-Rockford Region, Bureau of Land, Division of Land Pollution Control, IEPA, to Keith Myers, GT Grinding, dated February 14, 1996. Re: Pre-enforcement conference follow-up letter.
61. Letter from Glenn D. Savage, Jr., Manager, Field Operations Section, Division of Land Pollution Control, Bureau of Land, IEPA, to Keith Myers, Guaranteed Tolerance Grinding, dated February 29, 1996. Re: Receipt of response submitted re: pre-enforcement conference.
62. Closure Plan, Former Drum Storage Area, GTG, prepared by Environmental Contractors of Illinois, Inc., dated April 16, 1996.
63. GTG Closure Review Notes, prepared by IEPA, dated April 19, 1996. Re: Review of Closure Plan. Attached maps and public notice of closure.
64. Letter from Edwin C. Bakowski, P.E., Manager, Permit Section, Bureau of Land, IEPA, to Guaranteed Tolerance, dated April 23, 1996. Re: Forwarding certification form. Signed by facility May 14, 1996.
65. IEPA Memo from Jackie S. Muchow to Bureau of Land RCRA Closure File, dated April 8, 1997. Re: Notice of Closure of GTG one HW storage area location in Rockford Region appeared in Rockford Register Star on May 3, 1996.
66. Yahoo! Yellow Pages Search Results, dated March 4, 1998. Internet address: <http://yp.yahoo.com>.
67. U.S. EPA Envirofacts Query Results, "List of EPA-Regulated Facilities in Envirofacts," dated March 4, 1998. Internet address: http://www.epa.gov:9966/envirodcd/owa/multisys_query.get_list.

68. U.S. EPA Envirofacts Query Results, "Envirofacts Report on Guaranteed Tolerance (EPA ID#: ILD984908103), Facility Location Information," dated March 4, 1998. Internet address: <http://mountain.epa.gov/cgi-bin/enviro/multisys2?facid=ILD984908103&sysid=100100>.
69. Record of Communication, from Alison Evans, TechLaw, Inc., to Suzanne Burnes, TechLaw, Inc., dated March 5, 1998. Re: Additional VSI notes.
70. Record of Communication, from Alison Evans, TechLaw, Inc., to Suzanne Burnes, TechLaw, Inc., dated March 5, 1998. Re: Additional VSI notes.
71. Rockford North Quadrangle and Rockford South Quadrangle 7.5 Minute Series Topographic Maps, U.S. Department of the Interior, Geological Survey, updated 1993.
72. Map of Two Mile Radius from GTG Facility, U.S. EPA SITEPLUS (Req s45320), dated March 4, 1998. Databases searched: CERCLIS, RCRIS, TRI, AFS/AIRS, SDWIS.
73. Record of Communication, from Suzanne Burnes, TechLaw, Inc., to project file, dated March 11, 1998. Re: Follow-up conversation with Mr. Keith Myers, GTG.

APPENDIX A
Visual Site Inspection Photograph Log



Report Photo No.: 1

Log Book Photo No.: 7A

Date: November 4, 1997

Time: Approximately 0930

Direction: North

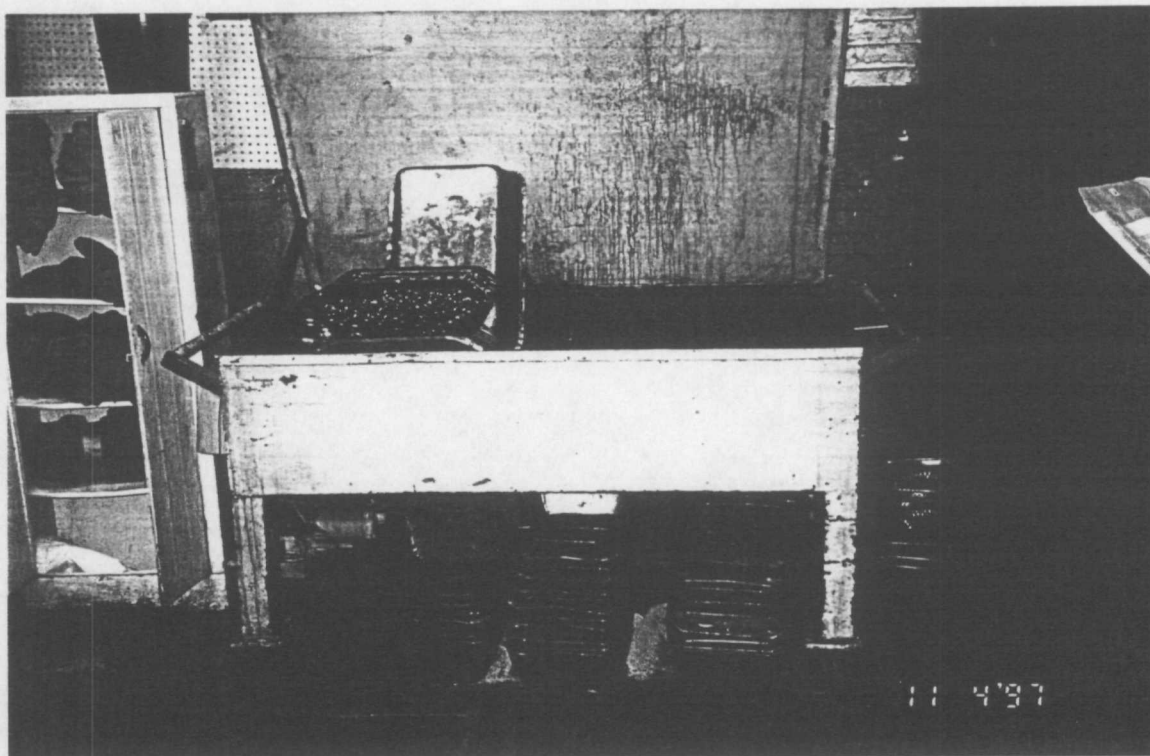
Description: View of the Drum Storage Area (SWMU 1) in the northwest corner of Building 2.
A white bag filled with swarf is visible on a wooden pallet at the unit.



Report Photo No.: 2
Log Book Photo No.: 8A
Date: November 4, 1997

Time: Approximately 0930
Direction: East

Description: View of the Drum Storage Area in the northwest corner of Building 2
(SWMU No. 1).

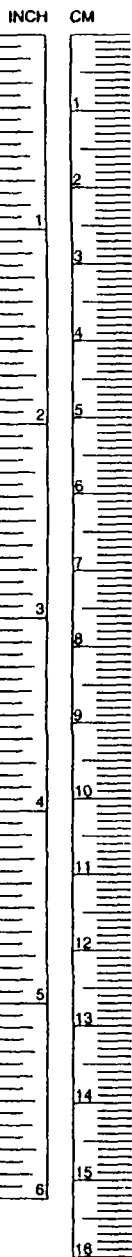


Report Photo No.: 3
Log Book Photo No.: 9A
Date: November 4, 1997

Time: Approximately 0930
Direction: South

Description: View of the Parts Washer (SWMU No. 2).

APPENDIX B
Visual Site Inspection Field Notebook



MEASUREMENT CONVERSIONS

IF YOU KNOW MULTIPLY BY TO FIND

LENGTH

inches	2.540	centimeters
feet	30.480	centimeters
yards	0.914	meters
miles	1.609	kilometers
millimeters	0.039	inches
centimeters	0.393	inches
meters	3.280	feet
metres	1.093	yards
kilometers	0.621	miles

WEIGHT

ounces	28.350	grams
pounds	0.453	kilograms
grams	0.035	ounces
kilograms	2.204	pounds

VOLUME

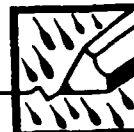
fluid ounces	29.573	milliliters
pints	0.473	liters
quarts	0.946	liters
gallons (U.S.)	3.785	liters
milliliters	0.033	fluid ounces
liters	1.056	quarts
liters	0.264	gallons (U.S.)

TEMPERATURE

$$^{\circ}\text{C} = (^{\circ}\text{F} - 32) \times .555$$
$$^{\circ}\text{F} = (^{\circ}\text{C} \times 1.8) + 32$$

Inches	Decimals of foot	Milli-meters
1/16	.0052	1.5875
1/8	.0104	3.1750
3/16	.0156	4.7625
1/4	.0208	6.3500
5/16	.0260	7.9350
<hr/>		
3/8	.0313	9.5250
1/2	.0417	12.700
5/8	.0521	15.875
3/4	.0625	19.050
7/8	.0729	22.225
<hr/>		
1"	.0833	25.400
2"	.1667	50.800
3"	.2500	76.200
4"	.3333	101.60
5"	.4167	127.00
<hr/>		
6"	.5000	152.40
7"	.5833	177.80
8"	.6667	203.20
9"	.7500	228.60
10"	.8333	254.00
11"	.9167	279.40
1 foot	1.0000	304.80

"Rite in the Rain"
ALL-WEATHER WRITING PAPER



Name Guaranteed Tolerance

Drinking
Address 2136 12th St.

Rockford IL 61104

Phone (815) 636-2925

Project VSI Team

Bill Croold, Tech Law

Alison Evans, Tech Law

Keith Myers, LITG

"Rite in the Rain" - a unique all-weather writing surface created to shed water and to enhance the written image. Makes it possible to write sharp, legible field data in any kind of weather.

a product of

J. L. DARLING CORPORATION
TACOMA, WA 98421-3696 USA

[illegible]

A Evans

- Some broken windows

- illegal storage of waste, pallets, -

- owned by Greenlee Texton

company started February 70

- Spent still stored in former
other storages are

HAZ. Drums Storage Area
dates of operation: 92-93 → 95
in place

clean closure
sawing still stored here (non-haz)
sealed floor - no apparent cracks

⇒ picture 8 - Facing North or former storage area

Picture 4 - Facing East of whole building

8:30 AM 4E

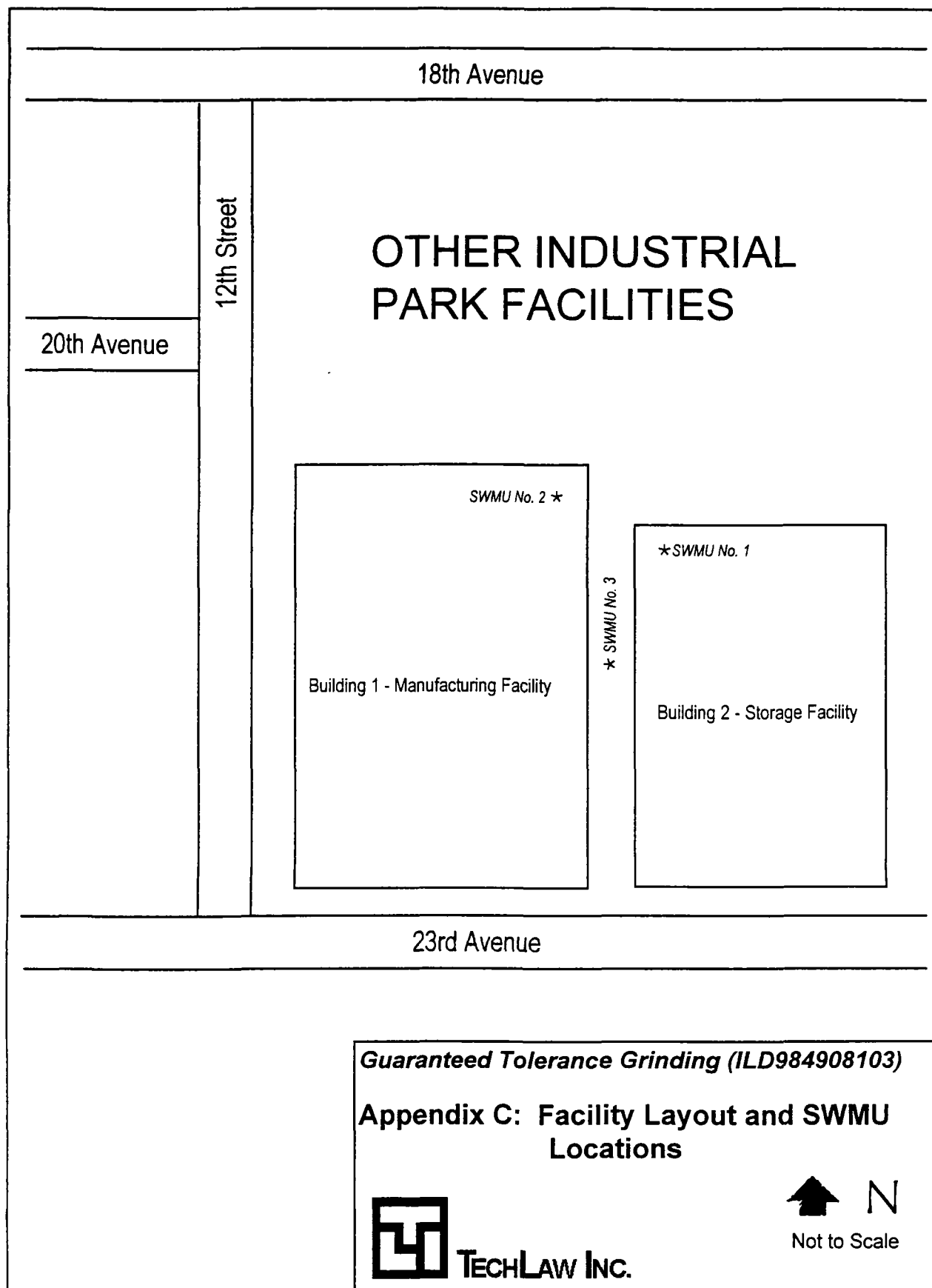
A Evans

- building formerly used as
a foundry

building 2:

- dirt & shavings storage area
fenced off
 - machine storage area
 - washer tank now uses Ren-haz
solvent → switched over Nov
20, 95'
 - never had need / nor used VST
 - soil samples never taken
in former flat waste storage
areas
- ⇒ picture 10: wash tank facing
south

APPENDIX C
Facility Layout and SWMU/AOC Locations



RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

GUARANTEED TOLERANCE GRINDING

EPA SITE NUMBER: ILD984908103

ROCKFORD, IL

SCORED BY: KEVIN HIGGINS

OF TECHLAW, INC.

ON 04/07/98

GROUNDWATER SCORE : 32.68

SURFACE WATER SCORE: 20.73

AIR ROUTE SCORE : 9.49

ONSITE SCORE : 0.00

MIGRATION SCORE : 19.92

EPA ID NO. : ILD984908103
GUARANTEED TOLERANCE GRINDING

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? N

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 15

NET PRECIPITATION (IN.) : 2

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F001

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

GROUNDWATER USE: AGRICULTURE OR INDUSTRIAL

DISTANCE TO WELL (MILES): 0.1

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? N

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 2.5

DISTANCE TO SURFACE WATER (MILES): 0.30

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F001

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 2.0

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

EPA ID NO. : ILD984908103
GUARANTEED TOLERANCE GRINDING

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F001

TOXICITY/PERSISTENCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

EPA ID NO. : ILD984908103
GUARANTEED TOLERANCE GRINDING

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: INACCESSIBLE

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F001

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.03

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N